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February 14, 2024

VIA ECF

Hon. John G. Koeltl United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

> Re: Rene v. 31 East 21 Express Inc. et al. Case No.: 21-cv-7435 (JGK) (KHP)

Dear Judge Koeltl:

We represent Plaintiff in this action. We write to request that the Court extend Plaintiff and Defendants Pun San Laan, Inc. and Thanaphan Laonutwuttikul's deadline to submit their <u>Cheeks</u> motion from February 14, 2024 until February 28, 2024. The parties have largely finalized the agreement and expect to finalize it shortly. I will be on vacation next week and therefore request two weeks to finalize the agreement and submit the Cheeks motion.

Thank you for your attention to the above.

Respectfully Submitted,
-----/s/----Michael Taubenfeld

APPLICATION GRANTED SO ORDERED

John G Koelf USDJ